

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Melanie Ann Kohli fka Melanie Ann Mortimer fka Melanie Ann Simmonette <div style="text-align: right;">Debtor(s)</div> PENNYMAC LOAN SERVICES, LLC <div style="text-align: right;">Movant</div> v. Melanie Ann Kohli fka Melanie Ann Mortimer fka Melanie Ann Simmonette and Charles J. DeHart, III, Esquire <div style="text-align: right;">Respondents</div>	19-03250 RNO Chapter 13 Proceeding Hearing Date: 03/31/2021 at 9:30 AM
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**CERTIFICATE OF NO RESPONSE
TO MOTION FOR RELIEF**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion filed on March 8, 2021 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than **03/22/2021**.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Respectfully submitted,
POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin
 By: Jill Manuel-Coughlin
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 Trevoose, PA 19053
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 Attorney for Movant
 DATED: March 23, 2021

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<p>IN RE: Melanie Ann Kohli fka Melanie Ann Mortimer fka Melanie Ann Simmonette</p> <p style="text-align: right;">Debtor(s)</p> <p>PENNYMAC LOAN SERVICES, LLC</p> <p style="text-align: right;">Movant</p> <p>v. Melanie Ann Kohli fka Melanie Ann Mortimer fka Melanie Ann Simmonette and Charles J. DeHart, III, Esquire</p> <p style="text-align: right;">Respondents</p>	<p>19-03250 RNO</p> <p>Chapter 13 Proceeding</p> <p>Hearing Date: 03/31/2021 at 9:30 AM</p>
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CERTIFICATION OF SERVICE AND NOTICE

JILL MANUEL-COUGHILIN, counsel for PENNYMAC LOAN SERVICES, LLC, hereby certifies that a copy of the foregoing Certificate of No Response was served upon the following persons by electronic notification or regular first-class mail, postage prepaid, on March 23, 2021:

Served Electronically:

J. Zac Christman, Esquire
530 Main Street
Stroudsburg, PA 18360
Attorney for Debtor(s)

Charles J. DeHart, III, Esquire
8125 Adams Drive, Suite A
Hummelstown PA 17036
Trustee

Served Via 1st Class Mail:

Melanie Ann Kohli fka Melanie Ann Mortimer fka
Melanie Ann Simmonette
278 Cider Run Road
Luzerne PA 18612
Debtor

Robert R. Kohli
aka Robert Ryan Kohli
5658 Main Road
Hunlock Creek, PA 18621
Co-Debtor

POWERS KIRN, LLC

By: /s/ Jill Manuel-Coughlin
By: Jill Manuel-Coughlin
Attorney ID # 63252
Eight Neshaminy Interplex, Suite 215
Trevose, PA 19053
Telephone: 215-942-2090
Facsimile: 215-942-8661
E-mail: Jill@powerskirm.com
Attorney for Movant
DATED: March 23, 2021